

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: HAIR RELAXER MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 3060 Master Docket Case No. 1:23-cv-00818 Honorable Mary M. Rowland
EUNICE FELTON,  Plaintiff,  v.  L'ORÉAL USA, INC., L'ORÉAL USA PRODUCTS, INC., SOFTSHEEN-CARSON, LLC, REVLON, INC., REVLON CONSUMER PRODUCTS CORPORATION, REVLON GROUP HOLDINGS LLC, DABUR INTERNATIONAL LTD., DABUR INTERNATIONAL USA LTD., NAMASTE LABORATORIES LLC, STRENGTH OF NATURE, LLC (f/k/a STRENGTH OF NATURE GLOBAL, LLC), and GODREJ SON HOLDINGS, INC.,  Defendants.	SHORT-FORM COMPLAINT AND JURY DEMAND  Civil Action No.

1. Plaintiff EUNICE FELTON (hereinafter, "Plaintiff") incorporates by reference Plaintiffs' Master Long Form Complaint in *In Re: Hair Relaxer Marketing, Sales Practices and Products Liability Litigation*, MDL 3060, filed as of May 15, 2023, as Document Number 106.

2. Plaintiff files this Complaint pursuant to CMO No. 2 and is to be bound by the rights, protections and privileges, and obligations of that CMO and other Orders of the Court. Further, in accordance with CMO No. 2, Plaintiff hereby designates the United States District Court for the Western District of Tennessee as Plaintiff's designated venue ("Original Venue"). Plaintiff makes this selection based upon one (or more) of the following factors (please check the

appropriate box(es)):

- X   Plaintiff currently resides in Memphis, Tennessee;
- Plaintiff purchased and used Defendant(s)' products in Tennessee;
- The Original Venue is a judicial district in which Defendant \_\_\_\_\_ resides, and all defendants are residents of the State in which the district is located (28 U.S.C. § 1391(b)(1)).
- X   The Original Venue is a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, specifically (28 U.S.C. § 1391(b)(2)) the Plaintiff's diagnosis with and treatment for endometrial cancer.
- There is no district in which an action may otherwise be brought under 28 U.S.C. § 1391, and the Original Venue is a judicial district in which Defendant \_\_\_\_\_ is subject to the Court's personal jurisdiction with respect to this action (28 U.S.C. § 1391(b)(3)).
- Other reason (please explain): \_\_\_\_\_.

3. For purposes of diversity jurisdiction, Plaintiff is a citizen of Tennessee.
4. Plaintiff is suing the following Defendants, and for purposes of diversity, whose

State of Incorporation/Formation and Principal Place of Business is as follows:

Check All Applicable Defendants	Defendant	State of Incorporation or Formation	Principal Place of Business
<input type="checkbox"/>	AFAM Concept, Inc. d/b/a JF Labs, Inc.	Illinois	Illinois
<input type="checkbox"/>	Avlon Industries	Illinois	Illinois
<input type="checkbox"/>	Beauty Bell Enterprises LLC f/k/a House of Cheatham, Inc.	Georgia	Georgia
<input checked="" type="checkbox"/>	Dabur International Ltd.	Isle of Man	Dubai
<input checked="" type="checkbox"/>	Dabur International USA Ltd.	India	Illinois
<input type="checkbox"/>	Dermoviva Skin Essentials, Inc.	Delaware	New Jersey
<input checked="" type="checkbox"/>	Godrej SON Holdings, Inc.	Georgia	Georgia
<input type="checkbox"/>	House of Cheatham LLC	Delaware	Georgia
<input checked="" type="checkbox"/>	L'Oréal USA, Inc.	Delaware	New York

Check All Applicable Defendants	Defendant	State of Incorporation or Formation	Principal Place of Business
X	L'Oréal USA Products, Inc.	Delaware	New York
<input type="checkbox"/>	Luster Products, Inc.	Illinois	Illinois
<input type="checkbox"/>	McBride Research Laboratories, Inc.	Georgia	Georgia
X	Namaste Laboratories LLC	Illinois	Illinois
X	Revlon Consumer Products Corporation	Delaware	New York
X	Revlon Group Holdings LLC	Delaware	Delaware
X	Revlon, Inc.	Delaware	New York
X	SoftSheen-Carson LLC	New York	New York
X	Strength of Nature, LLC	Georgia	Georgia
<input type="checkbox"/>	Other (Please identify):	Tennessee	Mississippi

**CASE SPECIFIC FACTS REGARDING  
HAIR RELAXER PRODUCT USE AND INJURIES**

5. Upon information and belief, Plaintiff began using hair relaxer products on or about the following date, 1980, and if applicable, stopped using hair relaxer products on or about the following date: 2022.

6. Upon information and belief, Plaintiff used the following hair relaxer products, which Plaintiff contends caused and/or contributed to their injuries and brings claims against the following Defendants:

Defendant	Product List (Select All Applicable Products)
<b><u>AFAM Concept, Inc.</u></b> <b><u>d/b/a JF Labs, Inc.</u></b>	<input type="checkbox"/> Hawaiian Silky - Crème Conditioning No Lye Silky Smooth Sheen Relaxer <input type="checkbox"/> Hawaiian Silky - Herbal No Lye Conditioning Relaxer System with Tea Tree & Avocado Oil - 2 Applications <input type="checkbox"/> Vitale - Olive Oil Anti-Breakage Relaxer No Base with Shea Butter - Regular Strength <input type="checkbox"/> Vitale Pro - New Texture Salon Exclusive Hair Relaxer <input type="checkbox"/> Vitale Mo'Body - Shea Butter Sensitive Scalp Relaxer with Oatmeal Protein

<b><u>Defendant</u></b>	<b><u>Product List (Select All Applicable Products)</u></b>
	<input type="checkbox"/> Vitale - Life and Body - Hair Relaxer with Aloe Vera - Smooth Silky Texture <input type="checkbox"/> Other (please specify): _____
<b><u>Avlon Industries, Inc.</u></b>	<input type="checkbox"/> Affirm Crème Relaxer <input type="checkbox"/> Affirm Sensitive Scalp Relaxer <input type="checkbox"/> Affirm Dry & Itchy Scalp Relaxer <input type="checkbox"/> Affirm FiberGuard Conditioning Crème Relaxer <input type="checkbox"/> Affirm FiberGuard Sensitive Scalp Conditioning Relaxer <input type="checkbox"/> Other (please specify): _____
<b><u>Beauty Bell Enterprises, LLC f/k/a House of Cheatham, Inc.</u></b>	<input type="checkbox"/> Africa's Best Herbal Intensive No-Lye Relaxer System <input type="checkbox"/> Originals by Africa's Best Originals Olive Oil Conditioning Relaxer <input type="checkbox"/> Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil <input type="checkbox"/> Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System <input type="checkbox"/> Organics by Africa's Best Kids Organic Conditioning Relaxer System <input type="checkbox"/> Organics by Africa's Best Kids Natural Conditioning Relaxer System <input type="checkbox"/> Texture My Way Men's Texturizing Kit <input type="checkbox"/> Texture My Way Women's Texturizing & Softening System <input type="checkbox"/> Other (please specify): _____
<b><u>House of Cheatham, LLC</u></b>	<input type="checkbox"/> Africa's Best Herbal Intensive No-Lye Relaxer System <input type="checkbox"/> Originals by Africa's Best Originals Olive Oil Conditioning Relaxer <input type="checkbox"/> Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil <input type="checkbox"/> Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System <input type="checkbox"/> Organics by Africa's Best Kids Organic Conditioning Relaxer System <input type="checkbox"/> Organics by Africa's Best Kids Natural Conditioning Relaxer System <input type="checkbox"/> Texture My Way Men's Texturizing Kit <input type="checkbox"/> Texture My Way Women's Texturizing & Softening System <input type="checkbox"/> Other (please specify): _____
<b><u>L'Oréal USA, Inc./ L'Oréal USA Products, Inc./ SoftSheen-Carson LLC</u></b>	<input type="checkbox"/> Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer <input type="checkbox"/> Dark and Lovely Beautiful Beginnings No Mistake Curl Softener <input type="checkbox"/> Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer <input checked="" type="checkbox"/> Dark and Lovely Triple Nourished Silkening Relaxer <input type="checkbox"/> Optimum Salon Haircare Defy Breakage No-Lye Relaxer <input type="checkbox"/> Optimum Salon Haircare Amla Legend Relaxer <input checked="" type="checkbox"/> Optimum Care Bodifying Relaxer <input type="checkbox"/> Optimum Multi-Mineral Reduced pH Crème Relaxer

<b><u>Defendant</u></b>	<b><u>Product List (Select All Applicable Products)</u></b>
	<p>X Bantu No Base Relaxer</p> <p><input type="checkbox"/> Ultra Precise No-Lye Conditioning Relaxer</p> <p><input type="checkbox"/> Mizani Butter Blend Relaxer</p> <p><input type="checkbox"/> Mizani Butter Blend Sensitive Scalp Relaxer</p> <p><input type="checkbox"/> Mizani Butterblend Prosolvent Relaxer</p> <p><input type="checkbox"/> Mizani Classic Relaxer</p> <p><input type="checkbox"/> Mizani Sensitive Scalp Relaxer</p> <p><input type="checkbox"/> Care Free Curl – Cold Wave Chemical Rearranger Super Strength</p> <p><input type="checkbox"/> Look of Radiance Permanent Crème Relaxer Kit</p> <p><input type="checkbox"/> Other (please specify): _____</p>
<b><u>Luster Products Company</u></b>	<p><input type="checkbox"/> Luster’s Pink Oil Moisturizer No-Lye Conditioning Relaxer</p> <p><input type="checkbox"/> Luster’s Pink Oil Moisturizer Short Looks Texturizer</p> <p><input type="checkbox"/> Luster’s Pink Oil Moisturizer Smooth Touch Relaxer</p> <p><input type="checkbox"/> PCJ Kit</p> <p><input type="checkbox"/> PCJ No Lye Kit - Adult</p> <p><input type="checkbox"/> PCJ No Lye Kit - Children’s</p> <p><input type="checkbox"/> ShortLooks Colorlaxer Diamond Black</p> <p><input type="checkbox"/> ShortLooks Colorlaxer Passion Red</p> <p><input type="checkbox"/> ShortLooks Colorlaxer Sable Brown</p> <p><input type="checkbox"/> Other (please specify): _____</p>
<b><u>McBride Research Laboratories</u></b>	<p><input type="checkbox"/> Design Essentials Honey Nectar Relaxer Kit - Time Release Regular Strength</p> <p><input type="checkbox"/> Design Essentials Sensitive Scalp Relaxer System</p> <p><input type="checkbox"/> Design Essentials Regular Conditioning Relaxer</p> <p><input type="checkbox"/> Other (please specify): _____</p>
<b><u>Namaste Laboratories</u></b>	<p>X ORS Olive Oil Built-In-Protection No-Lye Relaxer – Full Application</p> <p><input type="checkbox"/> ORS Olive Oil No-Mix Salon Formula Crème Relaxer</p> <p>X ORS Olive Oil Ultra Nourish Crème Hair Relaxer</p> <p><input type="checkbox"/> ORS Olive Oil Built-In-Protection No-Lye Relaxer – New Growth</p> <p><input type="checkbox"/> ORS Olive Oil Zone Relaxer – Targeted Touch-Up No-Lye Hair Relaxer</p> <p><input type="checkbox"/> ORS Olive Oil Curl Stretching Texturizer</p> <p><input type="checkbox"/> ORS Olive Oil Crème on Crème Touch-Up No-Lye Hair Relaxer</p> <p><input type="checkbox"/> ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical</p> <p><input type="checkbox"/> ORS Olive Oil Texlax and Stretch Semi-Straightening System</p> <p><input type="checkbox"/> ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System</p> <p><input type="checkbox"/> ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System</p> <p><input type="checkbox"/> ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle</p>

<b><u>Defendant</u></b>	<b><u>Product List (Select All Applicable Products)</u></b>
	Shield <input type="checkbox"/> ORS Olive Oil Professional No-Lye Relaxer Kit <input checked="" type="checkbox"/> ORS Olive Oil Professional Crème Relaxer <input type="checkbox"/> Namasté Salon System Triple Emulsion Relaxer <input type="checkbox"/> Namasté Salon System Crème Relaxer <input type="checkbox"/> Namasté Salon System Conditioning Sensitive Scalp No-Lye Relaxer <input type="checkbox"/> Namasté Salon System Crème Relaxer Salon Trial Pack <input type="checkbox"/> (Other (please specify): _____)
<b><u>Revlon, Inc./ Revlon Consumer Products Corporation/ Revlon Group Holdings LLC/ Revlon</u></b>	<input type="checkbox"/> African Pride – No Lye Relaxer Kit <input type="checkbox"/> African Pride – No Base Relaxer <input type="checkbox"/> African Pride – Multi Length Texturizer Kit <input type="checkbox"/> African Pride – Dream Kids No Lye Relaxer Kit <input type="checkbox"/> All Ways Natural – No Lye Conditioning Crème Relaxer Kit <input type="checkbox"/> Arosi Aromaphoric Relaxer System <input checked="" type="checkbox"/> Crème Of Nature Relaxer Cream <input checked="" type="checkbox"/> Crème Of Nature Relaxer Kit Argan Oil <input type="checkbox"/> Crème of Nature Herbarich Conditioning Crème Relaxer System Kit <input type="checkbox"/> Crème of Nature Herbarich Conditioning Crème Relaxer and Texturizing System <input type="checkbox"/> Crème of Nature Herbarich No Base Relaxer <input type="checkbox"/> Crème of Nature No Base Relaxer <input type="checkbox"/> Crème of Nature No Lye Relaxer <input type="checkbox"/> Crème of Nature Sodium Relaxer Kit <input type="checkbox"/> Crème Of Nature Cni No Lye Relaxer <input checked="" type="checkbox"/> Crème Of Nature Cni Sunflower & Coconut Oil - Creme <input type="checkbox"/> Crème Of Nature Eden Relaxer <input type="checkbox"/> Fabulaxer No-Lye Relaxer <input type="checkbox"/> Fabulaxer Gro-7 <input type="checkbox"/> Revlon Realistic No-Base Relaxer <input checked="" type="checkbox"/> Revlon Realistic No Lye Relaxer Kit <input type="checkbox"/> Other (please specify): _____
<b><u>Strength of Nature, LLC</u></b>	<input type="checkbox"/> African Pride Olive Miracle Deep Conditioning Crème-on-Crème No Lye Relaxer 8 Salon Pack Touch-Ups <input type="checkbox"/> African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer <input type="checkbox"/> African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner <input checked="" type="checkbox"/> African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application <input type="checkbox"/> African Pride Olive Miracle Deep Conditioning No-Lye Relaxer, One Complete Touch-Up <input type="checkbox"/> African Pride Shea Miracle Texture Softening Elongating System

<b><u>Defendant</u></b>	<b><u>Product List (Select All Applicable Products)</u></b>
	<input type="checkbox"/> African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit <input type="checkbox"/> African Pride Dream Kids Olive Miracle Relaxer <input type="checkbox"/> African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit <input type="checkbox"/> Dr. Miracle's No Lye Relaxer Kit <input type="checkbox"/> Dr. Miracle's New Growth No-Lye Relaxer Kit <input type="checkbox"/> Elasta QP Normal Relaxer Kit <input type="checkbox"/> Elasta QP Normal Relaxer Kit 2 Applications <input type="checkbox"/> Elasta QP Resistant Relaxer Kit <input type="checkbox"/> Elasta QP Sensitive Scalp Kit 12 Application Economy Pack <input type="checkbox"/> Elasta QP Sensitive Scalp Kit – 4 Applications <input type="checkbox"/> Elasta QP No Base Crème Relaxer <input type="checkbox"/> Elasta QP SOY OYL No-Base Relaxer <input type="checkbox"/> Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit <input type="checkbox"/> Elasta QP No-Base Relaxer <input type="checkbox"/> Elasta QP Extra Body No-Base Regular Relaxer <input type="checkbox"/> Elasta QP Extra Body No-Base Super Relaxer <input type="checkbox"/> Gentle Treatment No-Lye Relaxer Gray Kit <input type="checkbox"/> Gentle Treatment No-Lye Relaxer <input type="checkbox"/> Just For Me Relaxer 1 Complete Touch Up Relaxer <input type="checkbox"/> Just For Me 4 Application Salon Pack Relaxer <input type="checkbox"/> Just For Me No-Lye Conditioning Crème Relaxer Kit <input type="checkbox"/> Just For Me No-Lye Conditioning Crème Relaxer Kit with Coil & Curl Cream <input type="checkbox"/> Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturize Lotion <input type="checkbox"/> Just For Me No-Lye Texture Softener System <input type="checkbox"/> Just For Me No-Lye Texture Softener System with Hair & Scalp Butter <input type="checkbox"/> Motions Classic Formula Smooth & Silken Hair Relaxer <input type="checkbox"/> Motions Professional 12-Application Salon Pack <input type="checkbox"/> Motions Silkening Shine No Lye Relaxer Kit <input type="checkbox"/> Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 2 Touch Up Application <input type="checkbox"/> Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch Up Application <input type="checkbox"/> Profectiv Procision Relaxer Kit Regular <input type="checkbox"/> Profectiv Relax and Refresh Kit Auburn Spice <input type="checkbox"/> Profectiv Relax and Refresh Kit Cherry Fusion <input type="checkbox"/> Profectiv Relax and Refresh Kit Jet Black <input type="checkbox"/> Profectiv Relax and Refresh Kit Mahogany Brown <input type="checkbox"/> Profectiv Relax and Refresh Kit Silky Black <input type="checkbox"/> Pro-Line Comb Thru Texturizer Kit <input type="checkbox"/> SmartPerm No-Lye Anti-Breakage Relaxer System <input type="checkbox"/> SmartPerm No-Lye Anti-Breakage New Growth Relaxer System, Smart

<b>Defendant</b>	<b>Product List (Select All Applicable Products)</b>
	<p>Grow Stimulator</p> <p><input type="checkbox"/> SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit, 4 Applications</p> <p><input type="checkbox"/> Smart Perm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications</p> <p><input type="checkbox"/> S&amp;B® Botanicals™ 2 Application Relaxer</p> <p><input type="checkbox"/> S&amp;B® Botanicals™ No-Lye Sensitive Scalp Relaxer, 1-App</p> <p><input type="checkbox"/> S&amp;B® Botanicals™ No-Mix Texturizer 2-App, with Deep Conditioner</p> <p><input type="checkbox"/> S&amp;B® Botanicals™ No-Mix Texturizer 2-App</p> <p><input type="checkbox"/> S&amp;B® Botanicals™ Relaxer 8-Touch Up</p> <p><input type="checkbox"/> Soft &amp; Beautiful No-Lye Crème Relaxer</p> <p>X Soft &amp; Beautiful No-Lye Ultimate Conditioning Relaxer System</p> <p><input type="checkbox"/> TCB Naturals Conditioning Argan Oil Vitamin E &amp; Olive No-Lye Relaxer</p> <p><input type="checkbox"/> TCB Naturals Conditioning Argan Oil Vitamin E &amp; Olive No-Lye Relaxer, 2 Applications</p> <p><input type="checkbox"/> TCB No-Base Crème Hair Relaxer with Protein &amp; DNA</p> <p><input type="checkbox"/> UltraSheen Supreme Conditioning No-Lye Relaxer</p> <p>X UltraSheen Ultra Moisturizing No-Lye Relaxer</p> <p><input type="checkbox"/> UltraSheen Ultra Moisturizing No-Lye Relaxer, with Keratin</p> <p><input type="checkbox"/> Other (please specify): _____</p>

7. Other manufacturer/products used by Plaintiff not identified above: N/A.

8. Plaintiff's use of Defendants' hair relaxer products caused serious injuries and damages including but not limited to the following:

- ☐ Uterine Cancer
- X Endometrial Cancer
- ☐ Ovarian Cancer
- X Other injuries and/or additional details (please specify): Total hysterectomy and bilateral salpingo-oophorectomy.

9. Approximate dates of diagnosis (injuries), if applicable at this time, that form the basis of Plaintiff's claims: July 2018.

**CAUSES OF ACTION AND THEORIES OF RECOVERY ADOPTED AND INCORPORATED IN THIS LAWSUIT**

10. Plaintiff hereby adopts and incorporates by reference as if set forth fully herein,

all common factual allegations contained in paragraphs 1 through 114 of the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060.

11. Plaintiff hereby adopts and incorporates by reference as if set forth fully herein, the following Causes of Action and the Prayer for Relief within the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060:

- X Count I – Negligence and/or Gross Negligence
- X Count II – Negligent Misrepresentation
- X Count III – Negligence *Per Se*
- X Count IV – Strict Liability: Design Defect
- X Count V – Strict Liability: Failure to Warn
- X Count VI – Breach of Implied Warranty of Merchantability/ Fitness for a Particular Use
- X Count VII – Breach of Express Warranty under state law and the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301 et seq.
- X Count VIII – Fraud/ Fraudulent Misrepresentation
- X Count IX – Fraudulent Concealment
- X Count X – U.S. State and Territory Statutory Consumer Protection and Unfair or Deceptive Trade Practices Claims
- X Count XI – Unjust Enrichment
- ☐ Count XII – Wrongful Death
- ☐ Count XIII – Survival Action

- ☐ Count XIV – Loss of Consortium
- ☒ Count XV – Punitive Damages
- ☒ Other Causes of Action: Tenn. Code. Ann. § 29-28-102(6).

12. Consortium Claim(s) (if applicable): The following individual(s) allege(s) damages for loss of consortium: N/A.

13. Survival and/or Wrongful Death Claim(s) (if applicable): The following individual(s) allege(s) damages for survival and/or wrongful death: N/A.

### **JURY DEMAND**

Plaintiff demands a trial by jury as to all claims in this action.

Dated this the 8<sup>th</sup> day of September, 2023.

RESPECTFULLY SUBMITTED  
ON BEHALF OF THE PLAINTIFF,



Michael A. London, Esq. (ML-7510)  
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